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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

LT. GEN. FRANKLIN LEE HAGENBECK, BRIG.
GEN. WILLIAM E. RAPP, and the UNITED
STATES OF AMERICA,

Defendants.

13 Civ. 2802 (AKH)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of Christopher Connolly dated September 20, 2013 and attached exhibit, and all prior pleadings and proceedings herein, defendants Lt. Gen. Franklin Lee Hagenbeck, Brig. Gen. William E. Rapp, and the United States of America, by their attorney, Preet Bharara, United States Attorney for the Southern District of New York, shall move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, for dismissal of the Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

Dated: New York, New York
September 20, 2013

PREET BHARARA
United States Attorney for the
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